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3	Los Angeles, CA 90017-5818 Telephone: 213-415-7200 E-mail: jsuh@goldbergsegalla.com	
4		
5	Attorneys for Defendant PROMINENT ESCROW SERVICES, INC.	
6	(Erroneously sued as PROMINENT ESCROW SERVICE)	
7	UNITED STATES DIST	DICT COUDT
8		
9	EASTERN DISTRICT O	F CALIFORNIA
10	DEDD A D A DEELEL D	GAGENO 1.01
11	DEBRA BAREFIELD,	CASE NO. 1:21-0
12	Plaintiff,	STIPULATION [<i>PROPOSED</i>] C
13	VS.	EXTEND TIMI TO FIRST AM
14	HSBC MORTGAGE SERVICES, INC.; SUMMIT MANAGEMENT COMPANY, LLC; U.S. BANK TRUST, N.A.; LSF10	COMPLAINT I THAN 28 DAYS
15	MASTER PARTICIPATION TRUST;	(Doc. 32
16	CALIBER HOME LOANS, INC.; NICKOLAS E. TENHEFF; LYNAE M.	
17	TENHEFF; PROMINENT ESCROW SERVICE; CHICAGO TITLE COMPANY;	
18	AND DOES 1-50, INCLUSIVE,	
19	Defendants.	
20		w=1 1 1053
21	WHEREAS, Plaintiff Debra Barefield ("Plaintiff") served	
$\begin{bmatrix} 21 \\ 22 \end{bmatrix}$	Prominent Escrow Services, Inc. ("Prominent'	') with her First A
	("FAC") on August 30, 2021; and	

CASE NO. 1:21-CV-00613-JLT

STIPULATION AND
[PROPOSED] ORDER TO
EXTEND TIME TO RESPOND
TO FIRST AMENDED
COMPLAINT BY NOT MORE
THAN 28 DAYS (L.R. 144)

(Doc. 32

Y;

Pld ("Plaintiff") served Defendant
tent") with her First Amended Complaint
wed with the original complaint; and
to the FAC is now due on September 20,

WHEREAS, Prominent was not served with the original complaint; and WHEREAS, Prominent's response to the FAC is now due on September 20, 2021, and

WHEREAS, Prominent requires additional time to prepare its responsive pleading after having only recently retained legal counsel; and

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STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO FILE RESPONSE TO FIRST

AMENDED COMPLAINT

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1	WHEREAS, Prominent and Plaintiff have agreed to stipulate to a 28-day		
2	extension of time, up to and including, October 18, 2021 for Prominent's response		
3	to the FAC; and		
4	WHEREAS, there have been <u>no</u> prior extensions of time to respond to the		
5	FAC.		
6	NOW THEREFORE, Prominent, by and through its undersigned counsel,		
7	and Plaintiff, in Pro Per, stipulate and agree that Prominent shall have an extension		
8	of time up to and including October 18, 2021 to respond to the FAC in this action.		
9			
10	Dated: September 20, 2021 GOLDBERG SEGALLA LLP		
11			
12	By: <u>/s/ Jason W. Suh</u> Jason W. Suh (SBN: 256573)		
13	Attorneys for Defendant		
14	Prominent Escrow Services, Inc.		
15	Dated: September 20, 2021		
16	By: <u>/s/ Debra Barefield</u>		
17	Plaintiff, in Pro Per		
18	[PROPOSED] ORDER		
19	Based upon the stipulation of parties, the Court ORDERS :		
20	1. The stipulation is GRANTED . Prominent Escrow Services, Inc.'s SHALL file a		
21	responsive pleading no later than October 18, 2021.		
22			
23	IT IS SO ORDERED.		
24	Dated: September 20, 2021/s/ Jennifer L. Thurston		
25	CHIEF UNITED STATES MAGISTRATE JUDGE		
26			
27			
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